

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**
Philadelphia Division

IN RE: Jiawonia L Wright	Case No. 24-10548-pmm Chapter 13
Nationstar Mortgage LLC, Movant	
vs.	
Jiawonia L Wright , Debtor	

**OBJECTION TO CONFIRMATION
OF DEBTOR'S CHAPTER 13 PLAN**

Nationstar Mortgage LLC ("Movant"), by and through its undersigned counsel, files this *Objection to Confirmation of Debtor's Chapter 13 Plan* (Doc 2), and states as follows:

1. The Debtor filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on February 20, 2024.
2. Movant holds a security interest in the Debtor's real property located at 4744 Sheffield Ave, Philadelphia, PA 19136 (the "Property"), by virtue of a Mortgage.
3. The Debtor filed a Chapter 13 Plan (the "Plan") on February 20, 2024 (Doc 2).
4. The Plan does not list the Movant as a Secured Creditor.
5. Although Movant has not yet filed its proof of claim, it is anticipated that the claim will show the pre-petition arrearage due Movant is \$21,092.93, whereas the Plan proposes to pay only \$0.00.
6. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§

1322(b)(3) and 1325(a)(5) and cannot be confirmed.

7. Movant objects to any plan which proposes to pay it anything less than \$21,092.93 as the pre-petition arrearage over the life of the plan.

WHEREFORE, Movant respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Movant as stated herein, and for such other and further relief as the Court may deem just and proper.

/s/Andrew Spivack

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Matthew Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN has been electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

BRAD J. SADEK, Debtor's Attorney
1500 JFK Boulevard
Ste 220
Philadelphia, PA 19102
brad@sadeklaw.com

KENNETH E WEST, Bankruptcy Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

Office of United States Trustee, US Trustee
Robert N.C. Nix Federal Building
900 Market Street Suite 320
Philadelphia, PA 19107

Via First Class Mail:

Jiawonia L Wright
26 Towpath Road
Levittown, PA 19056

Date: March 14, 2024

/s/Andrew Spivack

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